

EXHIBIT G-1

George J. Gerro (SBN 325168)
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Self-Represented

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, BURBANK COURTHOUSE**

GEORGE GERRO, an individual,

Plaintiff,

vs.

BLOCKFI LENDING LLC, a Delaware
limited liability company; SCRATCH
SERVICES, LLC, a Delaware limited
liability company; and DOES 1 through
100,

Defendants.

) **CASE NO.: 20STCV31493**

)

) **ASSIGNED FOR ALL PURPOSES TO:**

)

) **Honorable Frank M. Tavelman**

)

) **Department A**

)

) **STIPULATION TO DISMISS**

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) **DEFENDANTS BLOCKFI LENDING,**

)

) **LLC; BLOCKFI, INC.; [PROPOSED]**

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) **ORDER THEREON**

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WHEREAS, this action was stayed due to the bankruptcy of Defendants BlockFi Lending LLC and BlockFi, Inc. (collectively “BlockFi”);

WHEREAS, on August 19, 2024, Plaintiff George Gerro (“Gerro”) filed a request for dismissal without prejudice of Defendants BlockFi Lending LLC and BlockFi, Inc. (collectively “BlockFi”);

WHEREAS, on August 19, 2024, the above-entitled court entered dismissal of BlockFi;

WHEREAS, BlockFi requests that Gerro dismiss BlockFi with prejudice;

WHEREAS, the subject matter of the above-entitled action is still pending before the United States Federal Court of Appeals for the Third Circuit, so dismissal with prejudice is not intended to constitute *res judicata* of the claims contained herein;

IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. BlockFi is dismissed with prejudice, but such dismissal shall not be claim preclusive.

2. BlockFi represents that BlockFi will not argue in any forum or tribunal that its dismissal necessitates claim preclusion, and Gerro reasonably relies upon BlockFi’s representation.

3. No third-parties or privies of BlockFi may rely upon this dismissal as being claim preclusive.

4. This stipulation shall not in any manner undermine the power, jurisdiction, or ability of the United States Bankruptcy Court for the District of New Jersey, the United States District Court of New Jersey, or the United States Court of Appeals for the Third Circuit to render appropriate relief upon Gerro’s claims which are currently pending, or may be pending in the future, before those courts. Said courts shall retain the power to abstain, defer, or otherwise allow this Court to decide any remaining issues between the parties.

DATED: September __, 2024

HAYNES AND BOONE, LLP

By: _____
Mark Erickson
Attorneys for Defendants BLOCKFI
LENDING, LLC and BLOCKFI, INC.

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DATED: September ____, 2024

By: _____
George J. Gerro
Self-Represented

**GOOD CAUSE APPEARING THEREFOR,
IT IS SO ORDERED.**

DATED: _____
HON. FRANK M. TAVELMAN
JUDGE OF THE SUPERIOR COURT